

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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GREENS AT CHESTER LLC,

Plaintiff,

-against-

TOWN OF CHESTER, JAMES. M. FARR,  
individually and as Building Inspector of the  
Town of Chester, ROBERT VALENTINE,  
individually and as Supervisor of the Town of  
Chester, ALEXANDER J. JAMIESON,  
as former Supervisor of the Town of Chester,  
STEVEN M. NEUHAUS, individually and as  
County Executive of the County of Orange,  
and THE COUNTY OF ORANGE,

Defendants.

**ATTORNEY  
DECLARATION**

No. 19-cv-06770 (CS)

Hon. Cathy Seibel

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PATRICK A. KNOWLES, an attorney duly admitted to practice before this Court,  
declares the following to be true, under penalty of perjury:

1. I am an attorney at FEERICK NUGENT MACCARTNEY, PLLC, attorneys for  
defendants TOWN OF CHESTER, JAMES M. FARR, ROBERT VALENTINE, and ALEXANDER J.  
JAMIESON (collectively, the “Town”), in the above-captioned action. I submit this declaration in  
support of the Town’s opposition to the motion to intervene filed by the Attorney General of the  
State of New York (“NYAG”).

2. Annexed hereto are exhibits submitted in support of the Town’s motion. For  
continuity purposes, Exhibits A-E are annexed to the accompanying declaration of Mary E.  
Marzolla and the exhibits annexed hereto begin at Exhibit F. Each exhibit is a true and complete  
copy of what it purports to be.

3. Annexed hereto as Exhibit F is a copy of an October 2017 email exchange between Defendant Jim Farr, P.E. and Richard "RJ" Smith.

4. Annexed hereto as Exhibit G is a copy of the complaint in Arlington Chester, LLC v. Town of Chester, et al., 09-cv-04110 (CS), filed April 27, 2009.

5. Annexed hereto as Exhibit H is a copy of the settlement agreement between Arlington Chester, LLC and the Town of Chester, effective June 18, 2010.

6. Your declarant has also reviewed the memorandum of law of defendants, STEVEN M. NEUHAUS and THE COUNTY OF ORANGE, in opposition to the NYAG's motion to intervene, and in the interests of economy, respectfully incorporates the futility and Rule 24 arguments as if fully set forth herein.

7. Based upon the foregoing, the accompanying memorandum of law, declarations, and exhibits, the Town respectfully requests that the NYAG's motion be denied.

I declare under the penalties of perjury that the foregoing is true and correct.

Dated: South Nyack, New York  
December 19, 2019

  
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PATRICK A. KNOWLES  
FEERICK NUGENT MACCARTNEY PLLC  
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